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8 Attorneys for Defendant,  
9 CITIBANK, N.A.

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 IRINA KAGANOVSKY-GREEN, an individual,

13 Plaintiff,

14 v.

15 CITIGROUP INC., a foreign corporation d/b/a  
16 CITIBANK, N.A., a national banking institution;  
17 and TRANS UNION LLC, a limited liability  
18 company; and DOE DEFENDANTS I-XX,  
19 inclusive,

20 Defendant.

21 CASE NO. 2:13-cv-02029-JCM-CWH

22 **STIPULATED PROTECTIVE ORDER**

23 PURSUANT to Local Rule 7-1, and FRCP 26(c)(1)(G), the parties by and through their  
24 undersigned counsel of record hereby stipulate as follows:

25 WHEREAS Defendant CITIBANK, N.A. is willing to produce the following confidential  
26 documents to Plaintiff subject to protective order:

27 A. Automated credit dispute verifications (Bates CITI0000058-CITI0000059).

28 WHEREAS, those documents contain the intellectual property of On-Line Data Exchange  
LLC (“OLDE”), a third party not involved in this litigation, and is proprietary to OLDE.

WHEREAS, the documents and information relate to trade secrets, confidential research,  
development, technology or other proprietary information belonging to CMI and/or OLDE, and/or  
personal income, credit and other confidential information of Plaintiff.

WHEREAS the parties seek to keep the information contained therein confidential;

WHEREAS the parties are amenable to a protective order; THEREFOR, the parties hereby



1 stipulate as follows:

2 A. The documents produced by CMI Bates CITI0000058-CITI0000059 shall remain  
3 confidential and may not be used in any manner outside of this litigation;

4 B. Any papers filed with the Court including those documents shall be done so under  
5 seal after first filing the appropriate motion with the Court pursuant to Kamakana v. City and State  
6 of Honolulu, 447 F.3d 1172 (9<sup>th</sup> Cir. 2006). Attorneys must file documents under seal using the  
7 Court's electronic filing procedures pursuant to Local Rule 10-5(b); and

8 C. Plaintiff shall return the documents to counsel for CMI upon the resolution of this  
9 litigation.

10  
11 Dated this 29<sup>th</sup> day of May, 2014

Dated this 29<sup>th</sup> day of May, 2014

12 COGBURN LAW OFFICES

WOLFE & WYMAN LLP

13  
14 By: /s/ Paul R.M. Cullen  
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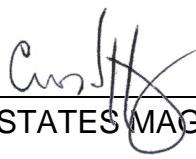
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18  
19 Attorneys for Plaintiff  
IRINA KAGANOVSKY-GREEN

Attorneys for Defendant,  
CITIBANK, N.A.

20 **ORDER**

21  
22 IT IS SO ORDERED \_\_\_\_\_ May 30, 2014.

23  
24  
25   
UNITED STATES MAGISTRATE JUDGE